

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

<b>Dana Albrecht,</b>	)	
	)	
<b>Plaintiff</b>	)	
<b>v.</b>	)	<b>Civil No. 1:25-cv-00093-SM-AJ</b>
	)	
<b>Hon. John Pendleton, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

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**MOTION FOR EXTENSION OF TIME**

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NOW COMES Plaintiff Dana Albrecht and respectfully moves this Honorable Court for a brief extension of 14 days, through and including **June 20, 2025**, to file an amended complaint. In support thereof, Plaintiff states:

1. Plaintiff is currently preparing an amended complaint pursuant to this Court's Order dated May 20, 2025 ([ECF No. 36](#)), in response to multiple motions to dismiss (ECF Nos. [31](#), [34](#), [35](#)) filed by different groups of defendants.
2. The amended pleading requires substantial revision in light of the legal arguments raised, including threshold jurisdictional and standing issues and complex constitutional and statutory claims.
3. In addition to the inherent complexity of the case, Plaintiff is contending with a high volume of legal research, factual review, and coordination of exhibits necessary to adequately plead the amended claims.
4. Further compounding the difficulty, Plaintiff has experienced unexpected delays due to unrelated professional and personal obligations, health-related issues, and other matters beyond Plaintiff's control.

5. This request is made in good faith and not for the purpose of delay. A short, two-week extension will allow Plaintiff to complete a thorough and coherent amended pleading that addresses the issues raised and avoids the need for premature or piecemeal litigation.
6. No party will be prejudiced by the brief extension. To the contrary, judicial economy will be served by permitting Plaintiff the time to submit a complete and considered filing rather than a rushed or incomplete one.

WHEREFORE, Plaintiff respectfully requests that this Court:

- A) Grant a 14-day extension of time up to and including June 20, 2025 for Plaintiff to file an amended Complaint; and,
- B) Allow all defendants adequate time to respond thereafter; and,
- C) Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,



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DANA ALBRECHT

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June 6, 2025

**CERTIFICATE OF SERVICE**

I, Dana Albrecht, certify that a copy of this Motion has been served on all parties of record via the CM/ECF system.

A handwritten signature in black ink, appearing to read "Dana Albrecht", written over a horizontal line.

DANA ALBRECHT

June 6, 2025.